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ATTORNEYS FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>  <b>CAMPISI CONSTRUCTION, INC.</b>  <i>Debtor.</i>	<b>Chapter 11</b>  <b>Bankruptcy No.: 14-12458-JKF</b>
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**DEBTOR'S OBJECTION TO PROOF OF CLAIM #19 FILED BY ADELPHIA  
MECHANICAL SERVICES, INC.**

1. On or about March 31, 2014, Campisi Construction, Inc. ("Debtor") filed the instant case under Chapter 11 of the Bankruptcy Code.

2. On or about August 19, 2014, Adelphia Mechanical Services, Inc. ("Adelphia") filed a Proof of Claim for \$68,299.76, Claim #19 ("Claim"). Adelphia's claim arises from a lawsuit it filed in the Montgomery County Court of Common Pleas, attached to the Claim as an exhibit, for allegedly unpaid invoices for services provided by Adelphia to Debtor ("Lawsuit").

3. Debtor objects to the Claim, as Debtor has paid Adelphia on such invoices.

4. Debtor further objects to the Claim pursuant to the four-year statute of limitations on breach of contract actions. Only one invoice, dated August 24, 2010 in the amount of \$1,200.00, as listed in the Lawsuit is for a time period within the four-year statute of limitations.

5. Debtor further objects to the Claim because Adelphia has not attached any invoices in support thereof.

6. Debtor further objects to the Claim because the Lawsuit does not evidence any monies owed to Adelphia, as such Lawsuit was never concluded to judgment in Adelphia's favor.

WHEREFORE, Debtor requests that the court disallow Claim #19, filed August 19, 2014, by Adelphia Mechanical Services, Inc., in its entirety.

Respectfully submitted,

By: /s/ Dimitri L. Karapelou, Esq.

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**Date: October 15, 2014**